

Amendments to the Drawings:

The attached sheet of drawings includes changes to Figure 4A-4C. As described in detail below, Figures 4A-4C has been amended to correct minor informalities and to place Figures 4A-4C in conformance with the present specification. This sheet, which includes Figures 4A-4C, replaces the original sheet including Figures 4A-4C.

Attachment: Replacement Sheet

REMARKS

The Official Action mailed February 9, 2006, has been received and its contents carefully noted. This response is filed within three months of the mailing date of the Official Action and therefore is believed to be timely without extension of time. Accordingly, the Applicant respectfully submits that this response is being timely filed.

The Applicant notes with appreciation the consideration of the Information Disclosure Statements filed on February 20, 2004; and October 11, 2005.

Claims 1-27 are pending in the present application, of which claims 1, 6, 9, 12, 15, 20 and 24 are independent. (Although the Office Action Summary shows that claims 1-80 are pending and that claims 28-80 are withdrawn, the Applicant notes that claims 1-60 were filed, and in the *Amendment and Response to Restriction/Election Requirement* filed on October 11, 2005, claims 28-60 were canceled. Therefore, claims 1-27 are pending in the present application.) Claims 1, 4-6, 8, 9, 12, 13, 15, 19, 20 and 24 have been amended to better recite the features of the present invention. For the reasons set forth in detail below, all claims are believed to be in condition for allowance. Favorable reconsideration is requested.

The Official Action objects to the drawings, asserting that the drawings do not show the feature, "a plurality of semiconductor film(s) isolated from one another which are provided over one surface of the insulating film" or the feature, "the wiring connected to an impurity region of the semiconductor film." In response, the Applicant has amended Figures 4A-4C in accordance with the description in the specification, and the Applicant has included reference characters in the specification and in the Figures identifying, for example, a semiconductor film 45, a wiring 63, a gate electrode 64 and a gate insulating film 65. Although the Applicant believes the specification and Figures show semiconductor films that are isolated from one another, the Applicant has removed this feature from claims 1, 6, 9, 12, 15, 20 and 24 without prejudice or disclaimer. The Applicant respectfully submits that the specification and drawings support the recitation of a wiring connected to an impurity region of a semiconductor

film, as shown, for example, in Figures 4A-4C. The Applicant respectfully submits that the amended specification is clear and supports the features illustrated in the drawings and recited in the present claims. Accordingly, reconsideration and withdrawal of the objections are in order and respectfully requested.

Paragraph 3 of the Official Action objects to the specification for various informalities. Specifically, the Official Action is concerned that "Figure 4A element 48 is not described in the specification," that the "Applicant uses element 49 to describe both the antenna (page 13 lines 1-2) and the protective film (page 13 line 2)," and that "it is unclear why the antenna reference numerals for Figures 4A-4C differ from the antenna reference numeral in Figure 3" (page 3, Paper No. 02022006). In response, typographical errors were corrected in the specification regarding the reference characters used to identify an antenna. Specifically, at page 13, lines 1-2 and 28, and at page 14, line 7, the specification has been amended to clarify that the antenna is identified, for example, by reference number 31. Also, for consistency, Figures 4A-4C have been amended to consistently use reference number 31 to identify the antenna in each embodiment. Additionally, Figures 4A-4C have been amended in conformance with the specification as noted above. The Applicant respectfully submits that the amended specification is clear and supports the features illustrated in the drawings and recited in the present claims. Accordingly, reconsideration and withdrawal of the objections are in order and respectfully requested.

Paragraph 4 of the Official Action objects to claims 9, 12, 20 and 24 asserting that the recitation of the feature, "a plurality of semiconductor film(s) isolated from one another which are provided over an insulating film as an active region" implies that "the insulating film is an active region." Also, Paragraph 6 of the Official Action rejects claims 1-27 under 35 U.S.C. § 112, first paragraph, asserting that independent claims 1, 6, 9, 12, 15, 20 and 24 lack an adequate description in the specification for "a device containing a plurality of semiconductor films that are isolated from one another."

Although the Applicant believes the specification and Figures show semiconductor films that are isolated from one another, the Applicant has removed this feature from claims 1, 6, 9, 12, 15, 20 and 24 without prejudice or disclaimer. Also, in response, claims 1, 6, 9, 12, 15, 20 and 24 have been amended for clarity. Specifically, claims 1, 6, 9, 12, 15, 20 and 24 have been amended to recite "a semiconductor film." The term "as an active region" has been deleted from claims 6, 9, 12, 15, 20 and 24 without prejudice or disclaimer. Dependent claim 4 has been amended to recite that a semiconductor film functions as an active region. The Applicant respectfully submits that amended claims 1, 6, 9, 12, 15, 20 and 24, when read in light of the specification, are adequately described and supported in the specification and definite. Also, the Applicant respectfully submits that the amended specification is clear and supports the features illustrated in the drawings and recited in the present claims. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 112 are in order and respectfully requested.

Paragraph 8 of the Official Action rejects claims 1-5 as anticipated by U.S. Patent No. 6,703,267 to Tanabe. The Applicant respectfully submits that an anticipation rejection cannot be maintained against the independent claims of the present application, as amended.

As stated in MPEP § 2131, to establish an anticipation rejection, each and every element as set forth in the claim must be described either expressly or inherently in a single prior art reference. Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

Independent claim 1 has been amended to recite an insulating film over a metal oxide; and a semiconductor film, a gate insulating film and a gate electrode, which are provided over the insulating film. Additionally, dependent claims 4 and 5 have been amended in accordance with claim 1.

Tanabe appears to teach that "the gate metal as a prospective lower electrode is covered with tungsten oxide and then a silicon nitride film" (column 3, lines 23-24).

However, Tanabe does not teach that a semiconductor layer, a gate insulating film and a gate electrode are formed over a metal oxide, either explicitly or inherently.

Since Tanabe does not teach all the elements of the independent claims, either explicitly or inherently, an anticipation rejection cannot be maintained.

Paragraph 12 of the Official Action rejects claims 6-8, 15, 16 and 18 as anticipated by U.S. Patent No. 6,885,032 to Forbes. The Applicant respectfully submits that an anticipation rejection cannot be maintained against the independent claims of the present application, as amended.

Independent claims 6 and 15 have been amended to recite a metal oxide; an insulating film over the metal oxide; and a semiconductor film, a gate insulating film, and a gate electrode over the insulating film. Forbes does not teach a metal oxide layer provided below an insulating film, a semiconductor film, a gate insulating film and a gate electrode, either explicitly or inherently.

Also, claim 6 has been amended to remove features which are not believed to be critical to the patentability of the claims. Specifically, claim 6 has been amended in order to delete the limitation related to an adhesion, without prejudice or disclaimer.

Since Forbes does not teach all the elements of the independent claims, either explicitly or inherently, an anticipation rejection cannot be maintained.

Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 102 are in order and respectfully requested.

Paragraph 20 of the Official Action rejects claims 9-11 as obvious based on the combination of Forbes and U.S. Patent Application Publication No. 2004/0256644 to Kugler. The Applicant respectfully submits that a *prima facie* case of obviousness cannot be maintained against the independent claims of the present application, as amended.

As stated in MPEP §§ 2142-2143.01, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available

to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art. "The test for an implicit showing is what the combined teachings, knowledge of one of ordinary skill in the art, and the nature of the problem to be solved as a whole would have suggested to those of ordinary skill in the art." In re Kotzab, 217 F.3d 1365, 1370, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000). See also In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); In re Jones, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992).

Independent claim 9 has been amended to recite a metal oxide; an insulating film over the metal oxide; a semiconductor film over the insulating film; and a gate insulating film between a semiconductor layer and a gate electrode.

Please incorporate the arguments above with respect to the deficiencies in Forbes. Kugler does not cure the deficiencies in Forbes. The Official Action relies on Kugler to allegedly teach an antenna in a same laser as a gate electrode. However, Forbes and Kugler, either alone or in combination, do not teach or suggest a metal oxide; an insulating film over the metal oxide; a semiconductor film over the insulating film; and a gate insulating film between a semiconductor layer and a gate electrode.

Also, claim 9 has been amended to remove features which are not believed to be critical to the patentability of the claims. Specifically, claim 9 has been amended in order to delete the limitation related to an adhesion, without prejudice or disclaimer.

Since Forbes and Kugler do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained.

Paragraph 24 of the Official Action rejects claim 12 as obvious based on the combination of Forbes and U.S. Patent No. 6,878,643 to Krulevitch. Paragraph 26 of the Official Action rejects dependent claims 13 and 14 as obvious based on the combination of Forbes, Krulevitch and Kugler. The Applicant respectfully submits that a *prima facie* case of obviousness cannot be maintained against the independent claims of the present application, as amended.

Independent claim 12 has been amended to recite a metal oxide; an insulating film over the metal oxide; and a semiconductor film, a gate insulating film, and a gate electrode over the insulating film.

Please incorporate the arguments above with respect to the deficiencies in Forbes. Krulevitch and Kugler do not cure the deficiencies in Forbes. The Official Action relies on Krulevitch to allegedly teach an antenna in a same layer as a gate electrode and on Kugler to allegedly teach that an antenna comprises a same material as a gate wiring. However, Forbes, Krulevitch and Kugler, either alone or in combination, do not teach or suggest a metal oxide; an insulating film over the metal oxide; and a semiconductor film, a gate insulating film, and a gate electrode over the insulating film.

Also, claim 12 has been amended to remove features which are not believed to be critical to the patentability of the claims. Specifically, claim 12 has been amended in order to delete the limitation related to an adhesion, without prejudice or disclaimer.

Since Forbes, Krulevitch and Kugler do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained.

Paragraph 29 of the Official Action rejects dependent claim 17 as obvious based on the combination of Forbes and U.S. Patent Application Publication No. 2002/0027247 to Arao. Paragraph 31 of the Official Action rejects dependent claim 19 as obvious based on the combination of Tanabe and Forbes. The Applicant respectfully submits that a *prima facie* case of obviousness cannot be maintained against the independent claims of the present application, as amended.

Please incorporate the arguments above with respect to the deficiencies in Forbes. Arao or Tanabe do not cure the deficiencies in Forbes. The Official Action relies on Arao and Tanabe to allegedly teach the features of the dependent claims. Specifically, the Official Action relies on Arao to teach a protective film having a DLC or CN film and on Tanabe to allegedly teach a metal oxide provided over the other side of an insulating film. However, Forbes, Arao and Tanabe, either alone or in combination, do not teach or suggest a metal oxide; an insulating film over the metal oxide; and a semiconductor film, a gate insulating film, and a gate electrode over the insulating film.

Since Forbes, Arao and Tanabe do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained.

Paragraph 32 of the Official Action rejects claims 20, 21 and 23 as obvious based on the combination of Tanabe, Forbes and Kugler. Paragraph 36 of the Official Action rejects claim 22 as obvious based on the combination of Tanabe, Forbes, Kugler and Arao. The Applicant respectfully submits that a *prima facie* case of obviousness cannot be maintained against the independent claims of the present application, as amended.

Independent claim 20 has been amended to recite a metal oxide; an insulating film over the metal oxide; a semiconductor film over the insulating film; and a gate electrode over the semiconductor film.

Please incorporate the arguments above with respect to the deficiencies in Tanabe, Forbes, Kugler and Arao. Tanabe, Forbes, Kugler and Arao, either alone or in combination, do not teach or suggest a metal oxide; an insulating film over the metal oxide; a semiconductor film over the insulating film; and a gate electrode over the semiconductor film.

Also, claim 20 has been amended to remove features which are not believed to be critical to the patentability of the claims. Specifically, claim 20 has been amended in order to delete the limitation related to an adhesion, without prejudice or disclaimer.

Since Tanabe, Forbes, Kugler and Arao do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained.

Paragraph 38 of the Official Action rejects claims 24, 25 and 27 as obvious based on the combination of Tanabe, Forbes and Krulevitch. The Applicant respectfully submits that a *prima facie* case of obviousness cannot be maintained against the independent claims of the present application, as amended.

Independent claim 24 has been amended to recite a metal oxide; an insulating film over the metal oxide; and a semiconductor film, a gate insulating film, and a gate electrode over the insulating film.

Please incorporate the arguments above with respect to the deficiencies in Tanabe, Forbes and Krulevitch. Tanabe, Forbes and Krulevitch, either alone or in combination, do not teach or suggest a metal oxide; an insulating film over the metal oxide; and a semiconductor film, a gate insulating film, and a gate electrode over the insulating film.

Also, claim 24 has been amended to remove features which are not believed to be critical to the patentability of the claims. Specifically, claim 24 has been amended in order to delete the limitation related to an adhesion, without prejudice or disclaimer.

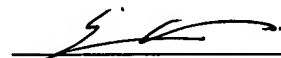
Since Tanabe, Forbes and Krulevitch do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained.

Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

The Applicant notes that dependent claim 26 has not been formally rejected in the Official Action. For at least the reasons set forth above, it is respectfully submitted that claim 26 is allowable.

Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



Eric J. Robinson
Reg. No. 38,285

Robinson Intellectual Property Law Office, P.C.
PMB 955
21010 Southbank Street
Potomac Falls, Virginia 20165
(571) 434-6789